

## **Exhibit K**

**Josephine Ann Svoboda**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF**  
**JOSEPHINE ANN SVOBODA**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )  
: SS.:  
COUNTY OF MIDDLESEX )

JOSEPHINE ANN ("JO ANN") SVOBODA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 62 Mandrake Road, Monroe Township, New Jersey 08831.

2. I am currently 72 years old, having been born on November 24, 1949.

3. I am the wife of Frank Richard Svoboda, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from metastatic lung cancer on May 18, 2016. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I met my husband when I was sixteen years old, and he was seventeen. We dated in high school, then he was drafted to serve in the Vietnam War. After he returned from Vietnam, we married and had two children, Janine and Krista. We had a great marriage. Frank

was a great father. We both had our own careers for most of the marriage. We planned on retiring together, and we had two grandchildren to look forward to spending time with during retirement. Frank and I did everything together.

6. Frank worked for Con Edison. On September 11<sup>th</sup>, 2001, he was attending a class for his work in Downtown Brooklyn at Con Edison's office there. He watched the planes hit the World Trade Center. He rushed home from work and made it home safe that day. But Con Edison sent him to Ground Zero soon after to work on recovery and clean-up. He and crews of other Con Edison workers helped to repair electrical systems in buildings around the World Trade Center. He worked there for about three to four weeks, even though the air was reported to be unsafe. Con Edison made him register with the World Trade Center Health Program when it first came out.

7. In March 2015, Frank had a scan that showed nodules on both of his lungs. At Mount Sinai Hospital, the doctors confirmed that he had bilateral lung cancer. From Mount Sinai, we then took him to Sloan Kettering, where they started him on chemotherapy. As a precaution, they did chemotherapy on his lymph nodes to try and shrink them before surgery. In September 2015, he underwent surgery to remove the tumor and the lower lobe of his lung. It was a difficult surgery, and he was always in pain. After the surgery, he had radiation. Frank had always been a healthy person—mentally, physically. He ate right and exercised. But when he got sick, especially in the last year, his quality of life really went downhill.

8. In January 2016, Frank's pain started to worsen. After another PET scan at the hospital, the doctors told us his cancer had spread to the bones in his rib cage. They had told me he was cancer free, and I was extremely upset that they hadn't radiated right where the tumor was before the surgery in order to remove the whole thing. He was given a prognosis of six months to live. Frank totally shut down—it was awful. He gave up on life. He hardly said a word from January until May. I tried to feed him, but he ate very little. The last five months of his life were extremely painful. He pretty much sat in his chair all day, although I tried to make sure he got out and got exercise. I took care of him, bathed him, did everything he needed. He knew he was dying. I don't know how I had the strength. I would carry him to the bathroom. To give me a break, my two sons-in-law would come over and take care of him.



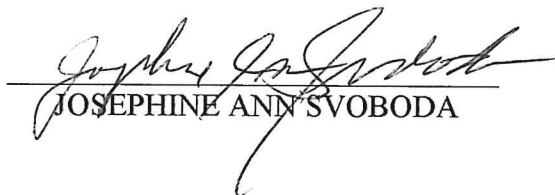
9. Every minute of every waking day, I was trying to get Frank treated. It was a year from his diagnosis until his death. We would go back and forth to Sloan Kettering in the city for chemotherapy, and to Basking Ridge, New Jersey for radiation. He was really fighting it the best he could mentally until the radiation oncologist told him the cancer spread to his bones and he had six months to live. I was in total denial. I prayed, I took him to healing masses, I had priests come. Every other time, God had come through for me. I spent most of that year praying and taking care of my husband. The chemotherapy destroyed him mentally and physically.

10. On May 15<sup>th</sup>, 2016, I had the priest come in and give him last rites. A neighbor would come and give him Holy Communion every day. The day before he passed, he didn't even have the strength to lift his hand for the Communion. My neighbor said, "Bring him to the hospital. Let him die with dignity." That Sunday, the day after my granddaughter's birthday, Frank and I were in bed, and I heard rattling in his chest. I called the nurse from our assisted living community. The nurse said, "You have to get him to the hospital." We brought him to the emergency room. The ER doctor spoke to my daughter and told us to send Frank to hospice. They admitted him and tried to drain the fluid from his lungs, but he couldn't even sit upright for them to drain his lungs. They were giving him morphine, and he lasted until that Tuesday. He passed away in the hospital. Had I known he wouldn't come home from the hospital, I wouldn't have let them take him to the emergency room. The day that he died, I said to him, "It's okay to go, I'll be okay." He closed his eyes and took his last breath, like he was waiting for me to say I'll be alright.

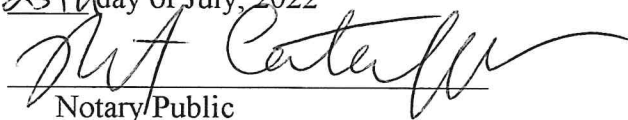
11. After he died, I went through all the motions of the paperwork and preparing for the funeral. A few months after he died, I joined a bereavement support group, and I went to therapy. I'm okay, I'm maintaining the household. I'm getting through life.

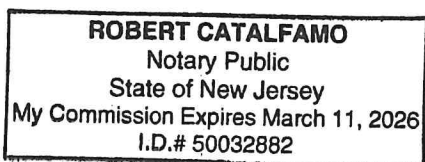
12. Frank didn't get to meet our youngest grandson, who is three years old. My older daughter was very strong, and she was there for me, but my youngest daughter took it the worst. My daughters were the world to him. They were both Daddy's little girls. We all regret not saying more to him. When I re-live it, I was too focused on making him well. I wish I could've said to him how wonderful he was.

13. Frank's illness was devastating to our life. We had a wonderful marriage. We knew each other for fifty years. Many people aren't blessed with forty-five years of great marriage. I was blessed, I have memories, and I have my children. But it's devastating. I'm just trying to go on with my life because I know Frank would want me to enjoy life.

  
JOSEPHINE ANN SVOBODA

Sworn to before me this  
25th day of July, 2022

  
Notary Public



**Janine Levitt**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
JANINE LEVITT**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY            )  
  : SS.:  
COUNTY OF MONMOUTH         )

JANINE LEVITT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 53 Blenheim Road, Manalapan New Jersey 07726.

2. My current age is 39, having been born on December 7, 1982.

3. I am the daughter of Frank Richard Svoboda, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from lung cancer on May 18, 2016. It was determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father was pretty much the best dad you could ask for. We saw each other every weekend. He would watch my son, who was two years old at the time. We would spend weekends together as a family. My father helped me with anything I needed. He was always happy to help fix my car, or to take my car for an oil change. When I needed a new car, he would call dealerships for me to help me find the best deal on a lease. We had a great relationship—he



would always guide me to the right answers when I had questions about my life, family, and relationships. My father was a calm and level-headed person. Since I'm a worrier, he was a great counterbalance to my personality.

6. I was in college on September 11<sup>th</sup>, 2001. My father was an electrician for Con Edison. He went down to the World Trade Center site shortly after 9/11 to work on electrical recovery in the area. He spent a lot of time down manholes, fixing electrical wiring underground. He was there for a few weeks working on the clean-up.

7. In 2015, my father went in for a chest X-Ray. The doctors said they found a tumor on his lungs. He was optimistic, but it was devastating for me to learn that he had cancer. He started chemotherapy in Summer 2015 and underwent a surgery in September 2015 to try and remove some of the mass. He underwent radiation before the surgery, because the doctors wanted to shrink the tumor as much as possible before attempting to take it out. They couldn't get all of the tumor out, which concerned me because I knew it would grow back. He was in a lot of pain after the surgery. Later on, my father had another scan, which confirmed my worst fears. His cancer had returned, and it had spread all over his body. That's when things took a turn for the worse.

8. My mom really did a lot to take care of my father. Although my parents had a nurse come in to provide around-the-clock care, my mother was my father's primary caretaker. He really could not be left alone. I would go see my father every weekend and would stay to take care of him the entire weekend. I would help drive him to doctor's visits and make sure his needs were met at home. Even if it was something as simple as helping him go to the bathroom. I wanted to give my mom a break, and she was carrying the burden of taking care of my father all the time.

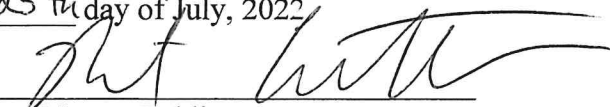
9. It was a really hard time in my life. After my father's surgery, I spent more time taking care of him. I had to put my two-year-old son in daycare because I didn't have as much time to look after him anymore. I was emotionally exhausted, and it was hard for me to carry the emotional burden of taking care of both my son and father. I battled with guilt when I worked during the week, always worrying about whether my son and father were alright. I was mentally and physically drained. I remember one morning I slept through my alarm, and I had to run to work. I teach fourth grade special education, which is already a demanding job in itself.

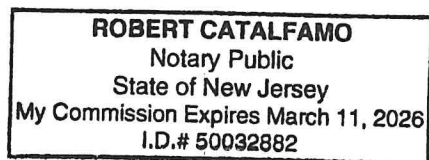
10. I made significant financial commitments towards paying for daycare and pre-school for my son when my father got sick. If my father wasn't sick, my parents would've watched my son during that time. My father also used to handle the electrical work and maintenance in my home, and after he got sick, I had to hire people to help fix my home.

11. When my father passed, I was overwhelmed by grief. I needed some therapy after his death, and I even saw mediums to help me feel better. I thought about his death constantly. It was a very emotional time in my life. My father never got to meet my second son, which was devastating to me. My father loved that I had a boy. It's sad to know that my sons will never meet their grandfather.

  
JANINE LEVITT

Sworn to before me this  
25<sup>th</sup> day of July, 2022

  
Notary Public





**Krista Lynn Thompson**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
KRISTA LYNN THOMPSON**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY )

: SS.:

COUNTY OF MONMOUTH )

KRISTA LYNN THOMPSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 16 Saint John's Drive, Freehold, New Jersey 07728.

2. I am currently 44 years old, having been born on April 25, 1978.

3. I am the daughter of Frank Richard Svoboda, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic lung cancer on May 18, 2016. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I had a strong relationship. When my first daughter was born, my father took care of her from the age of three months to five years old. He would drive to my house to stay with my daughter and would watch her all day, because he was retired. He was a huge part of my life and my daughter's life. At the time, I was going through a divorce with my husband, and I was a working single mom. I re-married in 2014. My father was a very

easygoing and fun-loving guy. He was the patriarch of the family. He loved his family more than anything. He was an electrician and very handy, so he'd always help fix things in the house. If I needed anything, I'd call my dad. Disney trips, Christmases, Thanksgiving—he managed all of those.

6. My father was an electrician for Con Edison and worked in lower Manhattan. He responded to the World Trade Center clean-up right around 9/11/2001, and he was working down at Ground Zero for about a month or so. He was responsible for restoring electric power to the area. He spent a lot of time in underground manholes. He took a bunch of photos of the site, and the devastation was just unbelievable. 9/11 hit very close to home for me, as I had a family member who was killed in the towers. My ex-husband's sister-in law worked for Cantor Fitzgerald on the 103<sup>rd</sup> floor of World Trade Center Tower One. They found the top half of her body in the rubble. She was only twenty-six years old. It was really horrific, a nightmare. My father didn't speak a lot about what he saw, but I noticed that he would always return home from Ground Zero with dusty and dirty clothes. He didn't want to talk about trauma with his kids.

7. My dad was diagnosed with lung cancer in March 2015. My mom told me about it on the phone. He started treatment at Sloan Kettering right away. I'm the oldest of my siblings, so I always felt a responsibility to take care of my parents. In November 2015, I started to notice a decline in my father's condition. I was pregnant with my second daughter when my dad was diagnosed with lung cancer, and I was working for KPMG at the time. In January 2016, the doctors gave my father one year to live. So, I decided to walk away from my career. It was hard, but it was the right thing to do. I needed to be there in those last months of my dad's life, because he had always been there for me. It was really hard for me to leave my career behind and to watch my father slowly die every day.

8. My father's illness had a financial impact on my life. When I quit my job to take care of my father full-time, my husband and I decided that we would go from a two-income household to a one-income household. That was scary. I had two daughters at the time, one who was an infant. It was hard to adjust our lifestyle to one income having just added an extra child to the family. When my dad died later on, we had to start hiring people to work on the house. He used to do all the electrical and maintenance work.

9. My father became very quiet and sad. He was in a lot of pain—agonizing pain. The doctors just kept dismissing it, which was frustrating. My mother forced them to do a scan, which is when the doctors found that the cancer had spread to his bones. His bones looked like Swiss cheese on the X-Ray. He had surgery to try and remove the cancer. The doctors were optimistic going into the procedure. They wanted to remove a section of the lower lobe of his lung. But when they opened him up, their outlook changed. The doctor came into the waiting room and told us his cancer had metastasized. My father had to have a lot of rehabilitation after that surgery. My father and mother stayed in the hospital. It was a scary time for all of us. My father also had radiation, which gave him burns. The radiation didn't work.

10. It was difficult taking care of my mother as well. I had to give her a break from taking care of my father. My mother had relied a lot on my father, it was like I almost had to re-teach her certain tasks when he fell ill. Like going out, shopping for groceries. She didn't know what to do. My mom had lost so much weight from worry and stress. I would juggle that with taking care of my dad, feeding him, caring for his bedsores, and helping him out with his rehabilitation. I managed all his doctors' appointments. All the while, I was taking care of my infant daughter and kindergarten-aged daughter. There was so much to handle. After a long day of taking care of my whole family, I would go home and cry.

11. My father also had mental health struggles as his health worsened. He had PTSD from Vietnam and the World Trade Center clean-up. The PTSD re-manifested after he was given a terminal prognosis. He later went on to palliative care, and we had a nurse come in twice per week.

12. On my older daughter's seventh birthday (May 16, 2016), my mother called me to tell me that my father was having difficulty breathing. My parents lived in a retirement community, so I told them to call the nurse on staff. They called the ambulance right away, and I stayed with my dad until he died in the hospital on May 18<sup>th</sup>. The doctor said, it's only a matter of hours until he died. My mom was very upset that I asked how long he had to live—she was in denial. She wanted him to get a procedure, but he didn't want to. I had to manage my parents and tell my mom that it was time for dad to go to hospice. We all sat there and watched him take his last breath. It was horrible. It was the worst year of my life.

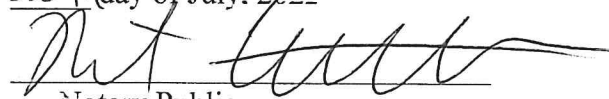


13. They say time makes the pain easier, but it doesn't. It's horrible. I became angrier on the inside after my father's death. Since his death, I've had less patience for my family, which I needed to go to therapy for. It's still very painful to relive that time. I'm saddened that my father can't see my children grow up—it's emotional at every graduation, dance recital, and family dinner. There's always an empty gap.

14. It's important for the courts to know what a grueling and horrible disease lung cancer is. My dad responded to the World Trade Center because he wanted to help people, but it just resulted in him being diagnosed with cancer. That was horrible. Lung cancer wiped all the life out of him, and out of our family.

  
KRISTA LYNN THOMPSON

Sworn to before me this  
25<sup>th</sup> day of July, 2022

  
Notary Public

**Maria A. Fierro-Switzer**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X

SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF  
MARIA A. FIERRO-SWITZER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )

: SS.:

COUNTY OF KINGS )

MARIA A. FIERRO-SWITZER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1952 Brown Street, Brooklyn, New York 11229.
2. I am currently 59 years old, having been born on June 4, 1962.
3. I am the wife of William E. Switzer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. William passed away from kidney cancer on March 12, 2018, at the age of 56. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I had a great relationship with my husband. We loved spending time with each other, joking around and making each other laugh. We enjoyed traveling to Myrtle Beach for

vacation in the summers. Our family was our main focus, and family dinners were very important to us all. It was time for us to spend together, catch up, and see how each other's days were going. We have two kids together, a daughter and son, and my husband coached them in their youth sports. He was also very involved in their schooling. To them, their father was everything. Because I was often working, he did many things around the house and they affectionately called him "Mr. Mom." He would even joke and ask "Where is my card?!" on Mother's Day.

6. William was a retired firefighter on 9/11. He had been forced to retire in 1998 due to several injuries he sustained while on the job. William was very passionate about the fire department and helping others, so naturally, he didn't hesitate to volunteer to become part of the search and recovery efforts at Ground Zero in the aftermath of the attacks. He would tell me, "once a fireman, always a fireman," and so he chose to spend many days at Ground Zero searching for missing people. This is who he was – he would do anything for anyone without giving it a second thought. He lost many friends as a result of the attacks and would often tell me about the noise he would hear from the fallen firefighters' oxygen tanks as he was searching in the rubble.

7. I will never forget the day he decided to see the doctor about pain he had been complaining about on the right side of his lower back. It was the day before my birthday, and he told me that he just did not feel right. Originally, he had not thought much of the pain, but it was becoming increasingly more intense, and he wanted to get it checked out.

8. William was very diligent about seeing his doctor for yearly checkups and having bloodwork done as well. And he was also a very fit person. I remember him teasing me about my love for pastries and cookies, saying that he only needed a spoonful.

9. After seeing several doctors and completing a series of tests, William was diagnosed with advanced stage kidney cancer that had already spread across his lower back and pulverized one of his hips. Hearing the diagnosis was like a punch in the gut. It completely took me by surprise. As a result of the cancer, William could not walk and ended up spending a month in the hospital. After some rehabilitation and learning how to walk again, he was released and came back home. Coming home presented another challenge for him since we have some steps coming into our home which I wasn't sure he would be able to negotiate.

10. I did everything I could to help him. I washed and bathed him, helped him get in and out of bed, and helped in transporting him to and from his cancer appointments every day. Since it would have been too much of a challenge to get William in and out of my car, the fire department transport would come and help us go to the appointments every day. He took about 30 pills each day as part of his treatment, and I had a diary to help me manage everything he had to take – what, when, and the dosage. William's cancer made him look like he was 89 years old. It was painful for me to see what he suffered through in only 10 months.

11. There were other responsibilities I still had too, like picking up my son from school and taking care of my children. It was difficult, and there were times in the beginning that I felt like crawling up in a ball and not getting out of bed. I could not sleep when he was at home, as I was constantly worried about what might happen to him during the night since his cancer was so advanced. And even when he was being cared for in the hospital, I would often be woken up and startled by a phone call from him at 2:00 or 3:00 in the morning. I would jump out of my skin when the phone rang for fear that it was the hospital calling to tell me that William passed away. But it was just William calling because he couldn't sleep and wanted to hear my voice.

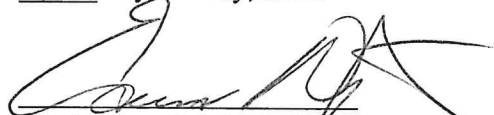
12. His diagnosis also had a severe financial impact on our family. Once he was diagnosed, I had to stop working. There was no family close by who could help us. And even since his passing, our financial situation is still not the same, as he was the main breadwinner of our family.

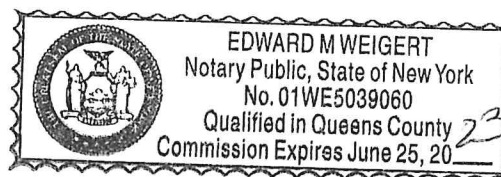
13. The scars left behind from William's illness and passing are always there. Every time one of my children has an accomplishment, we are reminded that their father is not here anymore to share in it with us. These feelings will never, ever go away. We are reminded of the sacrifices he made each anniversary of the September 11<sup>th</sup> terrorist attacks. He selflessly volunteered to assist at Ground Zero in the aftermath of these attacks, and that selfless act ultimately led to his cancer diagnosis, subsequent suffering, and later death. This should never be forgotten.

14. I am still in shock and disheartened by the experience. I wake up everyday and feel like I am in a dream. It felt like my entire life was turned upside down in one day, and my entire family, but mostly my husband, suffered for 10 agonizing months because of it. The pain is still there, and it will never go away. I am tired of crying and wonder when I will stop, but I do not think that I ever will. To me, it is that painful. Even if I go outside to try and enjoy a beautiful day, I feel like an empty shell.

  
MARIA A. FIERRO-SWITZER

Sworn to before me this  
16 day of May, 2022

  
Notary Public



**John Thomas Switzer**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
JOHN THOMAS SWITZER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NORTH CAROLINA )

: SS.:

COUNTY OF MECKLENBURG )

JOHN THOMAS SWITZER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5006 Blackberry Lane, Matthews, North Carolina 28014.

2. I am currently 66 years old, having been born on June 4, 1956.

3. I am the brother of William E. Switzer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from metastatic kidney cancer on March 12, 2018, at age 56. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I had a close relationship with my brother William. I was adopted, and after my adoptive parents died, I returned to my birth family and was reunited with my biological younger brother, William, in 1967. We were close during our teen years. I watched over my brother. We got along great and were typical brothers. Once a year, I would get together with William at my condo in Myrtle Beach, South Carolina. We would golf and enjoy the beach with



his family. For Thanksgiving each year, I would visit him and his immediate family in New York. I had a close relationship with William and his wife and daughter, Maria and Samantha. I have children of my own, and we would all get together as a family for holidays.

6. William was an FDNY fireman. He didn't talk about 9/11 much, except that it was a mess. He saw horrible things, like people jumping out of windows. I know that William responded to the first bombing of the World Trade Center in 1993, as well as to the World Trade Center attacks on 9/11/2001. At the time of 9/11, William was actually retired on disability from the fire department. Still, he went down to the site to help out and clean up.

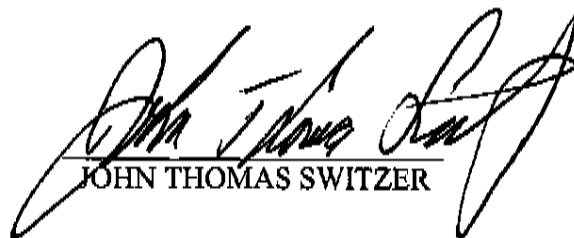
7. Before William was diagnosed with kidney cancer, he was having a lot of pain in his side. We thought his hip was broken. The doctors went in and did a scan, where they found renal cell carcinoma, which had spread to his hip bones, his brain, and all over his body.

8. William received treatments for several months and was in and out of the hospital. It was a long, drawn-out process. I would drive up there once or twice a month to care for William until he passed. I incurred some expenses. It was expensive to fly or drive up to New York and expensive even just to park my car in the city. His wife Maria still had to work, so she couldn't care for him all the time, and I would step in to help. It would take William an hour just to go up and down the stairs. Before he died, he was in the hospital for a whole month. I would stay with him often in the hospital. At that point, they couldn't get his cancer under control with medication. It was not a pleasant experience.

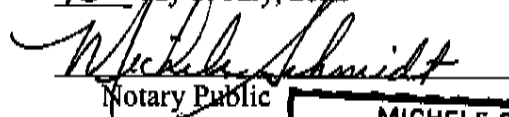
9. I knew my brother was dying, but we never knew when he was going to pass. He didn't want to die; he had kids. When I visited, I would tell him, "Billy, I have to go home—I have to go to work." But he didn't want me to go, because he didn't know if he was ever going to see me again. During that time, I had two bad discs in my back. Two days before William died, I left to go home for a surgery. I told him, "I'll see you next week." He passed away after I left, and I couldn't make it to his funeral. I was still recovering from the surgery, and I couldn't even walk. My wife also had pancreatic cancer at this time, so I was balancing that as well. It really killed me that I couldn't get back up to New York for his funeral. Even though I got to say my goodbyes, it still hurt that I couldn't honor his death by attending his funeral.

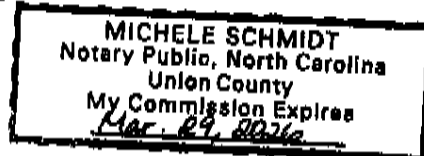
10. It was just a conglomeration of nightmares. No one wants to see anybody die, especially not their brother. I was worried for Maria as well. William was still young, and he

had his whole life ahead of him. He had kids and a wife. Nothing will bring him back, and not a day goes by that I don't think about him.

  
JOHN THOMAS SWITZER

Sworn to before me this  
15<sup>th</sup> day of July, 2022

  
Notary Public



**Samantha M. Switzer**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al,

**AFFIDAVIT OF  
SAMANTHA M. SWITZER**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF KINGS     )

SAMANTHA M. SWITZER, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 1952 Brown Street, Brooklyn, New York 11229.
2. I am currently 25 years old, having been born on June 22, 1996.
3. I am the daughter of William E. Switzer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from kidney cancer on March 12, 2018, at the age of 56. It had been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. I was 21 years old at the time of my father's death.

6. My father was my best friend. He coached me in basketball and softball for nine years growing up. He would drive us to and from activities, such as dancing and swimming, so we affectionately called him the “mom-dad,” since he did everything. He would cook, clean, and even make cupcakes for us to bring to school. He came to every event that we had and would always cheer us on. He was my everything and was beside me my whole life until he became sick and later passed away.

7. My father was a fireman and volunteered to go to Ground Zero on September 11<sup>th</sup> to assist with the search and recovery efforts and to help find his fallen brothers and sisters from the fire department. I was young at the time, but I remember that day vividly with all the commotion and screaming. My dad had turned on the TV at the urging of my grandmother. When he saw what had happened, he immediately left to go down there to help. He continued to go to Ground Zero every day for weeks after the attack.

8. My father had always been careful about his health. He made sure he had yearly checkups and lab work. There was never anything out of the ordinary that would be any cause of concern. However, when he began experiencing pain he never had before, it prompted him to get further testing done. I was at home and answered the call from his doctor after he had these further tests done. I could tell right away that the prognosis was not good. He was diagnosed with kidney cancer. It was a devastating diagnosis to our family. We never imagined that 10 months later, my father would be gone.

9. This was a very difficult time for me personally, and a difficult time for my family financially. I was working three separate jobs to help to take care of my father, while he was sick, my mother and younger brother. I was also a full-time student at the time trying to further my education. I had to step up and do this because my mother was forced to stop working

to become my father's full-time caretaker. I was often either at work or school every day of the week, but with any free time I did have, I made sure to go to the hospital to visit my father.

10. I spent as much time as I could by my father's side, and we as a family tried to reassure him throughout his illness that he would be okay. Unfortunately, there were constant complications, and the cancer continued to spread despite treatment. It came to a point that there was not much more that the doctors could do for him, and their goal was to try and make him as comfortable as possible. It all became very real to me when my mother sat my brother and me down together to explain this to us. I felt so many different emotions about it all. I didn't want to lose my father, but I didn't want him to suffer anymore. We thought that he would have a few more weeks to a month to live, but sadly, his health deteriorated quickly and he passed shortly thereafter. We were hoping to at least bring him home, but he was suddenly gone. I still struggle to comprehend why or how any of this happened. I truly miss my father.

11. It was difficult going to school during this time knowing that my dad was sick. He was constantly in and out of the hospital. The last graduation my dad was able to attend was my high school graduation, and I had promised him that I would work hard so that I could attend nursing school and become a nurse. I later did attend and graduate from nursing school, but unfortunately my father had already passed. I was not able to share this accomplishment with him. I know he would have been so proud.

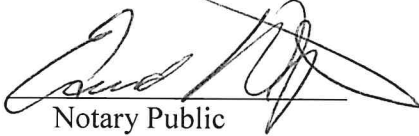
12. I have thought a lot about all of the other accomplishments and experiences that I will not get to share with my father. I realize that he will never be able to walk me down the aisle at my wedding, or have the opportunity to be a grandfather to my kids. These are things every girl wants to be able to share with her father, and I struggle with the fact that I will never get that.

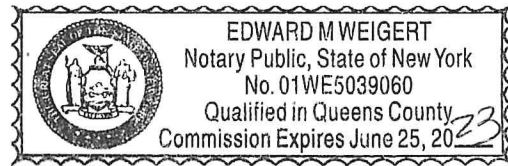


I often wonder why this had to happen. I feel it was all ripped away from me at such a young age, and speaking about my experience continues to make me upset.

  
SAMANTHA M. SWITZER

Sworn to before me this  
10 day of May, 2022

  
Notary Public



**Linda Karen Perotti**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF**  
**LINDA KAREN PEROTTI**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY    )  
                                  : SS.:  
COUNTY OF OCEAN        )

LINDA KAREN PEROTTI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1018 Sarasota Drive, Forked River, New Jersey 08731.

2. I am currently 66 years old, having been born on August 6, 1955.

3. I am the daughter of George M. Thomas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic cancer of unknown primary origin on October 4, 2016. It was medically determined that this cancer was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was raised near the water; my father's business was in fishing. He was a boat captain, and our family had a small fishing vessel. Boating was our life. On the weekends, we would fish, crab, clam, or just park in a bay and have lunch out on the back deck. That's what I would look forward to every year. It was my main hobby and the most uplifting activity in my life. We would go out on the boat, and the rest of the world would melt away. My father lived

an active lifestyle centered around boating. That all stopped when my father became sick. My father was a great support in my life. After my husband died, I moved away due to financial reasons. My parents would come to visit, but it was over a three-hour drive. When my father became ill, he could no longer make the drive. My husband died when my sons were young, so my father was the male figure in my sons' lives. My father would teach my younger son about boating, fishing, crabbing, and clamming. My older son is autistic, and my father would always help me when my son went into fits of rage. It's emotionally draining to raise an autistic child alone. My father helped me through my husband's death and many hard times in my life.

6. My father worked for the NYC Department of Sanitation. He worked on a boat that helped bring debris from the World Trade Center site to the Fresh Kills Staten Island landfill. He drove a boat that would pick up debris that fell into the water from the landfill. As a result of constantly working with debris, he was always breathing poisonous air and asbestos into his lungs. He was surrounded by it every day. He worked on this job from the start of the clean-up efforts shortly following 9/11/2001 until the end of the clean-up efforts in July 2002.

7. My father suffered multiple 9/11-related respiratory illnesses and cancers. Within a few years following 2001, my mother would often call me to tell me my father didn't feel well. He suffered from asthma gastro-esophageal reflux disease (GERD), which forced him to change his diet. My father was first diagnosed with a melanoma of the left eye, and he nearly lost his eye. I remember visiting a hospital on the Upper East Side several times with him as he received radiation treatments for his eye cancer. Later on, he developed thyroid cancer, which spread to his kidneys.

8. It was hard to take care of both my aging parents while my father was ill. Since my mother herself was elderly, I used to drive her and my father fifty minutes from their home on Long Island to the hospital in NYC. That was in addition to the three and a half hours I had to drive from New Jersey to Long Island. My mother is a very anxious woman, and my father's illness worried her greatly. One of the times when we went to the hospital, my mother wasn't feeling well due to an IBS episode. She insisted she wanted to come to the hospital but ended up having a horrible abdomen pain in the hospital bathroom. I then had to take her myself to the emergency room section of the hospital, and they wouldn't even supply us with a wheelchair. I remember her crying out in pain in the ER waiting room. Meanwhile, my father was upstairs in



a different hospital wing being treated for his cancer.

9. My mother called me one day in 2016 to tell me my father had a blood clot in his leg and that he had to be rushed to the hospital. When they tested my father at the hospital, they found that the cancers had spread throughout his whole body and were destroying his kidneys. They wanted to put him on dialysis. My father was in the hospital for two weeks as they tried to save his kidneys. I got a call from the hospital that my father was not doing well and that I should hurry up and come back to the hospital as soon as possible. By the time I met my brother in the parking lot, my father had already passed. I didn't foresee that happening, and the doctors really thought they could save him. But that's not what happened. My father's kidneys failed, and he went into hemorrhagic shock. It was really hard to wrap my head around the fact that I couldn't say goodbye.

10. After my father's death, the responsibility of taking care of my mother fell to my brother and me. My father did everything for my mother—physically, emotionally, and spiritually. My mother is a very sweet and trusting woman, and my father was more alert to how the world was. After my father's death, my mother fell victim to the "grandma" phone scam and called me in a panic because she thought my son asked for money. When my mother needed a new car, she had no idea how to pick one out because my father had always done that for her. She didn't know anything about her investments, so my brother and I had to go over her finances with the brokers. My father also handled all of the work around the house for my mother, so when he fell ill, my brother and I had to split the responsibilities of maintaining my parents' home.

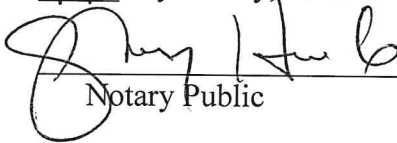
11. In 2018, a year and a half after my father passed, I came down with breast cancer. I went through hell with chemotherapy, and I was bedridden for many months. I was all by myself. My father wasn't there for me to lean on as an emotional support, and I was in tears and in pain most of the time I was getting treated for breast cancer.

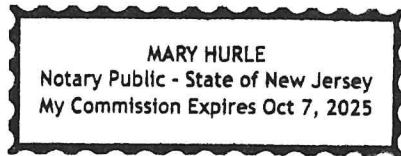
12. My life is very difficult without my father. My older son is high-functioning autistic and can't really help me. It's difficult to manage my illness, my son, and my mother. My father has missed many family milestones since his passing. My younger son went to the police academy, graduated, and became a police officer. My father wasn't there for any of that. The same son is getting married next year, and my father won't be around for that either. My

father was a wonderful man. Everybody loved him. He was thoughtful, kind, and supportive. He was a good father and grandfather.

  
LINDA KAREN PEROTTI

Sworn to before me this  
19<sup>th</sup> day of July, 2022

  
Notary Public





**Evelyn Thomas**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
EVELYN THOMAS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF NASSAU     )

EVELYN THOMAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 21 Adam Road West, Massapequa, New York 11758.

2. I am currently 92 years old, having been born on February 24, 1930.

3. I am the wife of George M. Thomas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from metastatic cancer of unknown primary origin on October 4, 2016. It was medically determined that this cancer was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. George and I were married for 66 years. We couldn't have had a better life together. I would say we had a very, very happy and good marriage. We had a great social life, and we loved dancing. George boated all his life and introduced me to that. We continued our active lifestyle with dancing, boating, clamming, and fishing for many years here on Long Island. My husband would do everything around the house, all the repairs. He would drive me

places. When you're married for 66 years and then suddenly alone, it's a tough situation. It gives me anxiety, to the point that I have to see a doctor for it. I'm 92 now, so it's harder to do the things my husband used to do for me. I do the best I can, but it's a big change in my life.

6. My husband worked for the NYC Department of Sanitation. When the September 11<sup>th</sup> attacks on the World Trade Center occurred, my husband helped move debris to the Staten Island Landfill. He drove a boat down by the landfill that would pick up debris which had fallen into the water. All the remains from 9/11 were there and put onto ramps so that recovery workers could search through it for remains and personal affects. He was exposed completely—there were no masks at the time. My husband's whole life was boating, even in his work. Before he worked for the Department of Sanitation, he was a commercial fisherman. George worked at the landfill until the 9/11 clean-up operations ceased in mid-2002. He was exposed all day long. I know many Sanitation workers who became sick or have died from 9/11-related illnesses.

7. George developed many respiratory issues related to his exposure. He developed asthma in 2011, and he always had to carry an emergency inhaler around with him. He suffered from gastro-esophageal reflux disease (GERD), and we had to change his diet in order to help him eat more comfortably. He was also diagnosed with COPD and chronic airway disease, both of which caused him difficulty breathing. George was in the World Trade Center Health Program, where he received medications and treatments for his breathing conditions.

8. George also had several 9/11-related cancers. He developed thyroid cancer in 2003 and had to have half his thyroid removed. He had melanoma of the left eye in 2006, for which he received radiation. He nearly lost his eye. George had a nasal passage cancer as well. He had to have surgeries to remove these tumors, in his eye, his thyroid, and his nose. He had other surgeries as well, but those were discoveries (endoscopies). George was diagnosed with spinal cancer in 2016, which is when things started to get a lot worse. He was walking the dog in September 2016 and fell. We took him to the hospital, and it turned out he had blood clots in his leg. This happened because the cancer had spread to his kidney and created the blood clots.

9. I was George's primary caretaker throughout his illnesses. We traveled every week to see a different doctor, and there were always at least two or three doctors' visits to be planned. I even started to do the driving after a while, because he really wasn't up to driving anymore. I gave George all his medications and did whatever I could do to help him. We had no

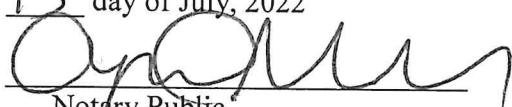
in-home health care—I did it all myself.

10. When George was admitted to the hospital in September 2016, we thought they would be able to put him on dialysis. His kidneys were failing. They brought him down to the ICU, but he passed out while on the dialysis. He died of hemorrhagic shock. Since his death, my life has been very difficult. I've known George since I was 17 years old. I'm now 92. He was the better half of me that I lost. I suffer from anxiety now, and a few times my son had to take me to the emergency room because I have high blood pressure from the anxiety. My kids have to do almost everything for me now.

11. There are so many milestones since George's death that I wish he were here for. We have great-grandchildren now that he's never met because of his passing. I do my best to see my friends when I can, but it's very lonely without George. His death has created a great change in my life and our family's lives. We used to do family outings on our boat, but we had to sell his boat once he died. My son lives close by, but my daughter lives three and a half hours away in New Jersey. I can't drive that far anymore. She does the best she can to come see me, but she can't visit often. So, it's hard to get the family together. He was a wonderful husband and father, and he is greatly missed.

  
EVELYN THOMAS

Sworn to before me this  
15 day of July, 2022

  
Notary Public

APRIL MURILLO  
Notary Public, State of New York  
Registration No. 01MU6373840  
Qualified in Nassau County  
Commission Expires on 4/16/2020